

National Association of Regulatory Utility Commissioners

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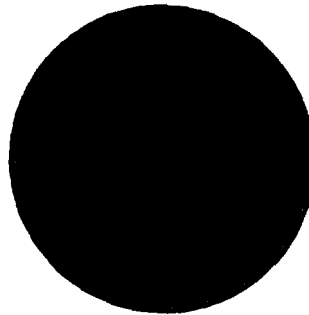
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

September 16, 1996

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

**RE: In the Matter of Policies and Rules Governing
Interstate Pay-Per-Call and Other Information Services
Pursuant to the Telecommunications Act of 1996.
CC Docket No. 96-146**

Dear Mr. Caton:

The National Association of Regulatory Utility Commissioners submits these reply comments generally supporting, inter alia, the comments filed by the Florida Public Service Commission on August 23, 1996 in the above captioned proceeding.

On the last page of its comments, Florida suggests that the requirements in the FCC's order and NPRM may not be sufficient to eliminate deceptive billing practices. The Florida commission suggests the FCC consider the "LEC Proprietary card billing block option" as outlined in its previous Petition to Initiate a Rulemaking.

As evidenced by our February 1996 resolution on the Florida petition, NARUC urges that the FCC carefully consider the options in the Petition from the Florida Public Service Commission in this Rulemaking.

A copy of the NARUC resolution is attached for your information and review.

Respectfully Submitted,

James Bradford Ramsay
Assistant General Counsel

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*Member of the Executive Committee of the Association

Resolution Regarding Pay Per Call Charges

WHEREAS, The complaints received by state commissions on segments of the Pay Per Call (PPC) industry continue and are the source of one of the greatest areas of consumer complaints, and

WHEREAS, The actions taken by the Federal Communications Commission (FCC) and the Federal Trade Commission thus far have not been sufficient to stop the abuses by segments of this industry, and

WHEREAS, The abuses include billing of PPC charges as regulated telecommunications services, billing PPC charges to customers who have apparently not made the calls, billing PPC charges for adult entertainment provided to children, unauthorized billing of PPC charges, billing charges which are not accurately described on the bill, and billing for voicemail and conference calls for which the subscriber has no knowledge, and

WHEREAS, The "Telecommunications Act of 1996" addresses prevention of unfair billing practices for information or services provided over toll-free telephone calls (Section 701) and requires the FCC to conduct and conclude a rule making to implement that section within 180 days; and

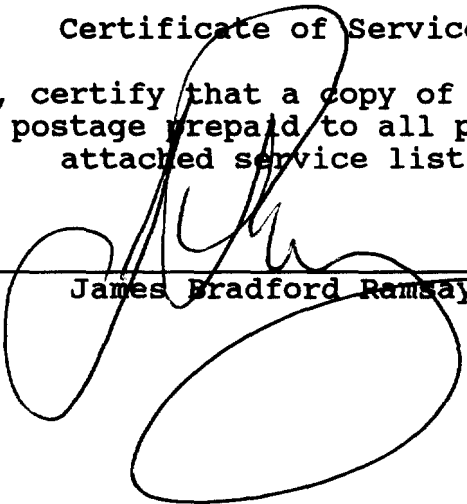
WHEREAS, The Florida Public Service Commission filed on December 7, 1995, a Petition to the FCC to Initiate Rulemaking and suggested solutions to stop these abuses; now, therefore be it

RESOLVED, That the National Association of Regulatory Utility Commissions (NARUC), assembled at its February, 1996, Winter Meeting in Washington, D.C., urges that the FCC consider the options in the Petition from the Florida Public Service Commission in its rulemaking that addresses the problems of the pay per call industry.

Sponsored by the Committee on Communications

Certificate of Service

I, James B. Ramsay, certify that a copy of the foregoing was sent first class mail postage prepaid to all parties listed on the attached service list.



James Bradford Ramsay

September 16, 1996